IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

RYAN KAISER, on behalf of himself and	§	
others similarly situated persons,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:18-cv-341
	§	
REVIVAL HOME HEALTHCARE	§	JURY DEMAND
SERVICES, INC. and SYLVESTER C.	§	
UDEZE,	§	
	§	
Defendants.	§	

DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO COMPEL DOCUMENT PRODUCTION AND BRIEF IN SUPPORT

COME NOW, Defendants, REVIVAL HOME HEALTHCARE SERVICES, INC. (hereinafter referred to as "Revival") and SYLVESTER C. UDEZE, (hereinafter referred to as "Udeze" and together with Revival, "Defendants") and file this their *Response to Plaintiff's Motion to Compel Document Production and Brief in Support*, (hereinafter referred to as the "Motion") and would respectfully show the Court the following:

I. <u>BACKGROUND FACTS</u>

1. On September 28, 2018, Plaintiff's Counsel served Defendants with a Request for Admissions and Request for Production of Documents. Defendants have complied and have provided Plaintiff will all responsive documents they have located. Defendants have turned over all documents in their possession, custody or control. Defendants are not withholding any privileged documents. Defendants agree to continue to search for any responsive documents and to supplement their responses when/if any other documents are found.

II. PRAYER

WHEREFORE, Defendants respectfully pray that the Court deny Plaintiff's Motion to Compel Document Production and for such other and further relief, both general and specific, to which they may be justly entitled.

Respectfully submitted,

THE CRAMER LAW GROUP

By: /S/ MICHAEL R. CRAMER

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2019 I electronically filed the foregoing with the clerk of the Court using the CM/ECF system that will send notice of the electronic filing to all parties of record.

/S/ MICHAEL R. CRAMER Michael R. Cramer